

Exhibit 1

USE OF CERTIFIED DEAF INTERPRETERS

A Certified Deaf Interpreter (CDI) is an individual who is deaf or hard of hearing and has been certified by the Registry of Interpreters for the Deaf as an interpreter.

In addition to excellent general communication skills and general interpreter training the CDE may also have specialized training and/or experience in use of gesture, mime, props, drawings, and other tools to enhance communication. The CDI has an extensive knowledge and understanding of deafness, the deaf community, and/or Deaf culture which combined with excellent communication skills, can bring added expertise into both routine and uniquely difficult interpreting situations.

A Certified Deaf Interpreter may be needed when the communication mode of a deaf consumer is so unique that it cannot be adequately accessed by interpreters who are hearing. Some such situations may involved individuals who:

- *Use idiosyncratic non-standard signs or gestures such as those commonly referred to as "home signs" which are unique to a family*
- *Use a foreign language*
- *Have minimal or limited communication skills*
- *Are deaf-blind or deaf with limited vision*
- *Use signs particular to a given region, ethnic or age group*
- *Have characteristics reflective of Deaf Culture not familiar to hearing interpreters.*

As a Team Member

Often a Certified Deaf Interpreter works as a team member with a certified interpreter who is hearing. In some situations, a CDI/hearing interpreter team can communicate more effectively than a hearing interpreter alone or a team of two hearing interpreters or a CDI alone. In the CDI/hearing interpreter team situation, the CDI transmits message content between a deaf consumer and a hearing interpreter; the hearing interpreter transmits message content between a deaf consumer and a hearing interpreter; the hearing interpreter transmits message content between the CDI and a hearing consumer. While this process resembles a message relay, it is more than that. Each interpreter receives the message in one communication mode (or language), processes it linguistically and culturally then passes it on in the appropriate communication mode. In even more challenging situations, the CDI and hearing interpreter may work together to understand a deaf individual's message, confer with each other to arrive at their best interpretation, then convey that interpretation to the hearing party.

For Deaf-Blind Individuals

When a consumer who is deaf-blind is involved, the CDI may receive a speaker's message visually, then relay it to the deaf-blind individual through the sense of touch or at close visual range. This process is not a simple relay in which the CDI sees the signs and copies them for the person who is deaf-blind. The CDI processes the message, then transmits it in the mode most easily understood by the individual who is deaf-blind.

Solo

The CDI sometimes works as the sole interpreter in a situation. In these instances, the CDI may use sign language or other communication modes that are effective with a particular deaf individual; and may use, with the hearing consumer, a combination of speech, speech reading, residual hearing, and written communication.

On the platform

The CDI sometimes functions as Interpreter before an audience. This may involve the CDI watching a hearing interpreter and restating the message to the audience in a different sign mod. At other times, the CDI may be in front of the audience to "mirror" comments or questions from a signing member of the audience so that the rest of the audience can see them.

USE OF CERTIFIED DEAF INTERPRETERS

CODE OF ETHICS

In an effort to protect and guide interpreters transliterators, and consumers, Registry of Interpreters for the Deaf ("RID") members established principles of ethical behavior. The organization enforces this Code of Ethics through its national Ethical Practices System. Underlying these principles is the desire to ensure for all the right to communicate.

This Code of Ethics applies to all members of the Registry of Interpreters for the Deaf, Inc. and to all certified non-members.

1. Interpreters/translitterators shall keep all assignment-related information strictly confidential.
2. Interpreters/translitterators shall render the message faithfully, always conveying the content and spirit of the speaker using language most readily understood by the person(s) whom they serve.
3. Interpreters/translitterators shall not counsel, advise or interject personal opinions.
4. Interpreters/translitterators shall accept assignments using discretion with regard to skill, setting, and the consumers involved.
5. Interpreters/translitterators shall request compensation for services in a professional and judicious manner.
6. Interpreters/translitterators shall function in a manner appropriate to the situation.
7. Interpreters/translitterators shall strive to further knowledge and skills through participation in workshops, professional meetings, interaction with professional colleagues, and reading of current literature in the field.
8. Interpreters/translitterators, by virtue of membership in or certification by RID, Inc., shall strive to maintain high professional standards in compliance with the Code of Ethics.

Benefits of Using a Certified Deaf Interpreter are:

- Optimal understanding by all parties
- Efficient use of time and resources
- Clarification of linguistic and/or cultural confusion and misunderstanding(s)
- Arrival at a clear conclusion in the interpreting situation.

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Exhibit 2



Ontario Interpreter Services Guidelines for Deaf Interpreters

Role of the Deaf Interpreter

A Deaf interpreter (DI) uses American Sign Language (ASL), gesture, mime and/or other communication strategies to facilitate communication between a Deaf consumer, a hearing consumer and a hearing interpreter. A Deaf interpreter is a Deaf individual who has native or near-native fluency in American Sign Language, who has interpreting experience and who has taken specialized training.

A Deaf interpreter will function as a member of the interpreting team. This may be needed if a Deaf person uses signs that are: particular to a region or age group, has minimal or limited communication skills, has had their communication hindered or altered because of sickness or injury, or uses non-standard ASL or gestures. A Deaf interpreter may be called upon when it is determined that a Deaf person is likely to be able to present concepts in a more comprehensible way because of shared culture and life experience. In some cases this is not always possible for hearing ASL-English interpreters.

The AVLIC Code of Ethics and Guidelines for Professional Conduct will guide the Deaf interpreter. The role of the Deaf interpreter is not to provide counselling or advocacy. The Deaf interpreter will ensure that the interpretation provided will be accurate and faithful to the intent of the participants in the conversation.

Interpreting Process -- A Team Model

In the interpreting process, interpreters receive the message in one language, process it, taking linguistic and cultural information into account, and then produce the interpreted message into the other language. A time lag will be experienced as the message is passed between the parties involved.

An OIS registered Deaf interpreter will work with an OIS registered hearing interpreter in a team model. The hearing interpreter will interpret from spoken English to ASL. The Deaf interpreter will then interpret from ASL to an appropriate level of ASL and/or will incorporate different communication strategies to convey the message to the Deaf consumer. The Deaf interpreter will interpret the Deaf consumer's remarks into ASL. The hearing interpreter will then interpret from ASL into spoken English. The Deaf and hearing interpreters may consult with each other in order to arrive at the best interpretation.

Consumers will be encouraged to address each other directly and not to address the interpreters. Hearing consumers should maintain eye contact with the Deaf consumer, not the interpreters

The interpreters will advise the participants on how best to work with the team. This may include: allowing more time for the interpreting process, requiring the speaker to moderate the pace of their speech, appropriate seating arrangements, etc.

A Deaf/hearing interpreter team often can communicate more effectively than a hearing interpreter alone, or than a team of two hearing interpreters, or than a Deaf interpreter working alone.

When there are two hearing interpreters, two Deaf interpreters are required.

Benefits of using a Deaf Interpreter:

- Optimal understanding by all parties
- Efficient use of time and resources
- Clarification of linguistic and/or cultural information to reduce misunderstanding(s)

Deaf consumers who may require a Deaf interpreter:

- Deaf immigrants
- Deaf persons who have been socially isolated (ie. From rural areas, inmates of mental facilities or prisons)
- Deaf Plus (mentally ill, developmentally delayed, educationally deprived)
- A Deaf person who is not comfortable with hearing people
- A Deaf person who is seriously ill, injured or dying (the Deaf person's ability to produce signs clearly or use both arms when signing may be affected)
- Deaf children who have not been exposed or who may have had limited exposure to English and/or ASL

A Deaf interpreter is highly recommended in situations where misunderstandings can result in especially serious outcomes. Deaf interpreter services should be used in the courts, where a person could be wrongly convicted, by the police when interviewing victims, witnesses or suspects who are Deaf, or in mental health settings where clear and accurate communication assists professionals in determining correct medication or other interventions. Children's Aid Society workers may need to use the services of a Deaf interpreter to ensure children are thoroughly protected.

If a hearing interpreter or a Deaf consumer requests the services of a Deaf interpreter, every effort will be made to provide this service.

OIS Registration

Deaf Interpreters wishing to register with OIS must have the following qualifications:

- *Sociolinguistics of ASL* (to know/understand ASL)
i.e., courses can be taken through Ontario Cultural Society of the Deaf (OCSD)
or The Canadian Hearing Society (CHS)
- *Indepth knowledge of Deaf culture*
- *Knowledge of the Role of the Deaf interpreter*
Adherence to the AVLIC Code of Ethics and Guidelines for Professional
Conduct

Understand the process of teaming with a hearing interpreter
- *Experience*
Experience working as a professional Deaf interpreter and/or training as a Deaf
interpreter through courses or workshops
- *Successful completion of an OIS knowledge and Attitude Interviews*
Understanding of the interpreting process. Knowledge of AVLIC Code of Ethics
and Guidelines for Professional Conduct
- *English as a second language*

Candidates wishing to work as Deaf interpreters will be interviewed in the region in which they will work by the Regional Director (RD) or manager and a committee comprised of a minimum of 2 Deaf community representatives and the staff interpreter.

Candidates will provide the Regional Director with a resume and references.

On successful completion of the interview an OIS Freelance Interpreter contract will be signed and ID card will be issued by the Provincial OIS office.

The registration process will be conducted once every 3 years.

Exhibit 3

DECLARATION UNDER PENALTY OF PERJURY OF RONALD E. OBRAY

Ronald E. Obray, having been duly sworn deposes and states as follows:

1. My name is Ronald E. Obray. I am founder and Chief Executive Officer of Hands On Video Relay Services, Inc. ("Hands On"). I am making this declaration for submission to the Federal Communications Commission to explain the significance of Certified Deaf Interpreters ("CDI").

2. I am a nationally certified sign language interpreter, holding NAD Level IV and RID - CI -CT certifications. Both of my parents are deaf and as a result I have been active in the deaf culture since childhood. I have worked as a professional interpreter since 1985. Since 1992, my wife, Denise, and I have operated a sign language interpreting company, originally under the name of Hands On Services, and now under the name of Hands On Sign Language Services, Inc.

3. In 2002, I established Hands On Video Relay Services, Inc. Since June of 2002, Hands On has provided Video Relay Service ("VRS"), first in a beta test mode, then in November of 2002 as a contract provider for AT&T, shortly thereafter as a contract provider for MCI, and later as a certified provider under the State of Washington's TRS program and now as an FCC certified VRS provider.

4. Hands On currently operates three call centers in the State of California, and one each in Washington, Arizona, Puerto Rico, and Florida, providing 24/7 VRS in English and Spanish.

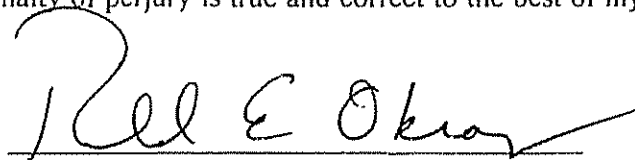
5. As discussed above, both of my parents are deaf. I have, therefore, grown up using sign language to communicate with my parents and their and my deaf friends. Children of deaf parents are sometimes referred to as CODAs, standing for Children of Deaf Adults. Having grown up in a deaf household, CODAs tend to have a high fluency with ASL and knowledge of deaf culture, more so than a standard interpreter who learns sign language at a later age. However, I quickly learned both as a CODA and as an interpreter of the limits of a hearing interpreter, CODA or not, in communicating in ASL. That is because hearing interpreters, even CODA interpreters, may learn ASL as their first language, but they are not forced to use it as their only means of communicating. They can still relate to the hearing world and the hearing culture. Deaf persons relate to the world visually out of necessity and to a distinct deaf culture. ASL is a visual language and deaf persons who use ASL have a similar fluency in sign language that native born English speakers have to that language. Almost all hearing interpreters – no matter how skilled or what their background may be – have less ASL fluency than CDIs, especially in dealing with persons with non-standard visual language skills, nor generally the depth of knowledge of deaf culture that someone who is deaf possesses.

6. This distinction is important to understand why CDIs are needed to effectively and accurately interpret certain calls. CDIs are deaf persons trained to assist in the interpreting from deaf and hard of hearing to hearing persons and vice versa. The CDI's native fluency in all ranges of sign language and thorough knowledge of deaf visual language variations allows him or her to

interpret in situations where a normal hearing interpreter cannot adequately function. These situations are typically where the deaf person has very low non-standard language skills, is sick or injured, has a mental disability, is foreign born, or a young child. Other situations would include high stress situations and situations where accuracy is particularly important, such as in the medical and legal areas. For these reasons, the use of CDIs is well established in community interpreting. In the VRS context, in addition to the situations discussed above, 911 calls in particular may require the use of CDIs. A situation requiring a call to 911 is a stressful situation even for a hearing person. It is equally, if not more so for a deaf person. 911 callers may be sick or injured, agitated, confused, or flustered. This is a situation calling for the most effective communication. In the VRS context, it will often require a CDI to achieve effective and accurate communication.

7. Our experience, both at Hands On VRS and at Hands On Services is that hearing interpreters can handle the overwhelming majority of calls and interpreting situations. However, there are those circumstances, such as those outlined above, that sometimes require CDIs to achieve effective, accurate and efficient interpretation. These are not situations that can be handled effectively by a supervisor, unless that supervisor is also a CDI, because supervisors lack the in-depth native signing ability and the depth of deaf culture experience of the CDI that even most of the CODAs don't possess. For these reasons Hands On's proposed VRS costs include costs for CDIs for 2007-08.

The above statement given under penalty of perjury is true and correct to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read "Ronald E. O'Bray", written over a horizontal line.

Ronald E. O'Bray

Dated: May 14, 2007

Exhibit 4



Information and resources related to American Sign Language (ASL), Interpreting and Deaf Culture

URL: <http://www.ASLinfo.com/deafculture.cfm>

Deaf Culture

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Carol Padden has defined Culture as a set of learned behaviors of a group of people who have their own language, values, rules of behavior, and traditions. (1988)

Culture results from a group of people coming together to form a community around shared experience, common interests, shared norms of behavior, and shared survival techniques. Such groups as the deaf, seek each other out for social interaction and emotional support

The essential link to Deaf Culture among the American deaf community is American Sign Language. This community shares a common sense of pride in their Culture and language. There exists a rich heritage and pride in the ability to overcome adversity as individuals and as a group. Deaf power hit the World in 1988 at Gallaudet University, an event known as the "**Deaf President Now**" (DPN) Movement. The protest has made a mark in history and proves that Deaf Culture is Pride and that Pride is Power.

Mastery of ASL and skillful storytelling are highly valued in Deaf Culture. Through ASL Literature, one generation passes on to the next its wisdom, values, and its pride and thus reinforces the bonds that unite the younger generation.

Another feature of this Culture is the role of marriage. It is estimated that 9 out of 10 members of the American Deaf community marry other members of their cultural group. Many D/deaf couples also wish for a deaf child so that they may pass on their heritage and Culture, it is not just the language but the values, the same values that hearing parents want to instill in their children.

Carol Padden says Deaf identity itself is highly valued; members of the deaf community seem to agree that hearing individuals can never fully acquire that identity and become a full-fledged member of the deaf community. Even with deaf parents and a native command of ASL the hearing person will have missed the experience of growing up deaf, including residential school. For many members of the deaf community, speech and thinking like a hearing person are negatively valued in Deaf Culture.

As Harlan Lane states in his book **Mask of Benevolence**, there is a fierce group loyalty, and this may extend to protectively withholding information about the community's language and Culture.

Going back to residential schools, these schools provide a vital link in the transmission of Deaf Culture and Language. Children here are able to communicate in a language readily understood by each other. Deaf children are able to partake in social clubs, sports and importantly enough, to be around deaf role models. It is important for deaf children to be encouraged to further their education and to learn that deafness does not mean you cannot grow up to be successful and happy (success of course being at each person's own perspective on what success and happiness means to them individually). This is not to say that mainstream education is iniquitous for deaf children, but we must keep in mind that socialization is essential to a child's growth and without a common language

socialization is limited.

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CERTIFICATE OF SERVICE

I, George L. Lyon, Jr., hereby certify that on this 15th day of May, 2007, copies of the foregoing COMMENTS ON INTERSTATE RELAY SERVICES FUND PAYMENT FORMULA AND FUND SIZE ESTIMATES was emailed to the following persons:

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/s/

George L. Lyon, Jr.